

**UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MASSACHUSETTS**

INA STEINER, DAVID STEINER, and  
STEINER ASSOCIATES, LLC,

Plaintiffs,

v.

EBAY INC., *et al.*,

Defendants.

Civil Action No. 1:21-CV-11181-DPW

**NOTICE OF NON-OBJECTION TO DISCOVERY RESPONSES**

The United States of America (the “Government”), by and through undersigned counsel, respectfully submits this Notice to update the Court and parties on discovery materials it has received from Defendant eBay. The Government reports as follows:

1. On January 5, 2024, the Court entered a Protective Order, which stated in relevant part that “Plaintiffs may file interrogatories and document requests on Defendants eBay, Wenig Wymer, Jones, and Baugh relating to their knowledge, if any, of Defendant Jim Baugh’s work for the CIA or FBI. The responses shall be disclosed to the Government and filed under seal with the Court. Within 14 days of receipt of the responses, the Government shall inform the Court whether it objects to public disclosure of the responses.” ECF No. 315 ¶ 1(b).

3. On March 8, Defendant eBay produced documents to the Government in response to Plaintiffs’ requests for production. ECF No. 339 ¶ 5. It also filed copies of the documents with the Court by lodging them with a Department of Justice (“DOJ”) Physical Security Specialist. *Id.*

4. The Government has reviewed the documents that Defendant eBay produced and has no objections to the public disclosure of those documents. Accordingly, the Government has informed eBay counsel that they may serve the documents on all parties to this litigation.

Dated: March 13, 2024

Respectfully submitted,

BRIAN M. BOYNTON  
Principal Deputy Assistant Attorney General  
Civil Division

BRIGHAM J. BOWEN  
Assistant Director, Federal Programs Branch

/s/ Christopher D. Edelman  
CHRISTOPHER D. EDELMAN  
(D.C. Bar No. 1033486)  
Trial Attorney  
U.S. Department of Justice  
Civil Division, Federal Programs Branch  
1100 L Street, NW  
Washington, D.C. 20005  
Tel: (202) 305-8659  
Fax: (202) 616-8460  
Email: christopher.edelman@usdoj.gov

*Counsel for the United States of America*